

2055 Niagara Falls Blvd., Suite #3, Niagara Falls, New York 14304

Telephone: (716) 297-6150 Facsimile: (716) 297-2265

www.CRAworld.com

December 28, 2012

Reference No. 056393

Mr. Michael Berkoff Remedial Project Manager United States Environmental Protection Agency – Region V Superfund Division, Remedial Response Section #2 77 West Jackson Boulevard (SR-6J) Chicago, IL 60604-3590



Dear Mr. Berkoff:

Re:

Response to USEPA Comments

Operation, Maintenance, and Monitoring Plan

12th Street Landfill Operable Unit No. 4

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Allegan and Kalamazoo County

Conestoga-Rovers & Associates (CRA) has prepared this letter, on behalf of the Weyerhaeuser Company (Weyerhaeuser), in response to the November 30, 2012 United States Environmental Protection Agency's (USEPA's) comments on the Operation, Maintenance, and Monitoring (OM&M) Plan submitted on April 18, 2012. For ease of review, each comment for which the USEPA requested clarification/revision is listed below, followed by CRA's response.

As USEPA is aware, the OM&M Plan was originally submitted for review in May 2011. In September 2011, USEPA requested that Weyerhaeuser begin collecting quarterly data in accordance with the May 2011 version of the OM&M Plan while USEPA continued the review and approval process (this approach was documented in CRA's letter to USEPA dated October 5, 2012). To date, five monitoring events have been completed under the OM&M Plan beginning in October 2011. During this time, two revisions to the OM&M Plan (April 2012 and the attached revision) have occurred. Both revisions have resulted in largely administrative changes to the document and have not resulted in any fundamental changes to the monitoring program in terms of locations or parameters collected, collection methodology, or data quality requirements. Furthermore, any changes made to the OM&M Plan as a result of USEPA's comments have been incorporated into the ongoing monitoring activities.

A number of triggers in the OM&M Plan, such as changes to the number and frequency of long-term sampling, are based on 2 years of monitoring data (i.e., eight quarterly events). Since the review and approval process of the OM&M Plan has not resulted in any substantive changes that will affect the validity of the data, Weyerhaeuser considers the five rounds of data to be useable data for evaluating the need for long-term monitoring needs and intends to submit an annual report documenting the data for 2011 and 2012 in January 2013 to USEPA.

Equal Employment Opportunity Employer





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SPECIFIC COMMENTS

USEPA Comment #1

Section 2.0 /Appendix B. Update this section with the correct references to the drawing provided in Appendix B. Update the drawings provided in Appendix B to reflect the final drawing set for the Remedial Action Completion Report.

Response

Appendix B has been updated to include all of the As-Built Drawings included in the Remedial Action Completion Report approved by the USEPA on October 1, 2012. Section 2.0 has been revised to include a complete list of the drawings included in Appendix B.

USEPA Comment #2

Section 2.3. Update this section to reflect current conditions and the expectations for the final future access controls. Include discussion of the approval process to amend the access controls as necessary.

Response

Section 2.3 has been updated to include current conditions and the expectation for the final future access controls including perimeter signs and a permanent marker approved in accordance with the Final Design. The perimeter sign language, design, and placement around the perimeter of the landfill are included in the discussion within this section of the report. Also included are the proposed text and layout for the permanent marker, shown on a new figure – Figure 4. The proposed approximate locations of the perimeter signs and the permanent marker are illustrated on a revised Figure 2. A statement has been added to indicate that USEPA and Weyerhaeuser will further evaluate the access controls to ensure they are appropriate long-term.

USEPA Comment #3

Section 4.0. Include a reference to the required components of the OMMP as specified in the Statement of Work in the Consent Decree.

Response

A paragraph has been added to the beginning of Section 4.0 to list the relevant required components of the OM&M Plan as indicted in the Statement of Work (SOW) of the Consent Decree.



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USEPA Comment #4

Section 5.3. This section does not discuss rinsate blanks or matrix spikes. Include text describing the rational and collection method for rinsate blanks and MS/MSD samples.

Response

A discussion of the rinsate/equipment blank sample collection method and frequency has been added to Section 5.3. In addition, a new section (5.4 Laboratory Accuracy Samples) has been added to the report to discuss matrix spike and matrix spike duplicate sample collection.

The table summarizing each sampling event has been updated to reflect the current sampling scheme for each event (quarterly and semiannual).

USEPA Comment #5

Section 5.4. For meaningful trend analysis, upgradient wells need to be sampled when downgradient wells are sampled. Revise text to include upgradient monitoring wells in the quarterly and semiannual monitoring programs.

Response

Section 5.4 (now Section 5.5) as well as the table preceding this section has been revised to state that all of the wells that were installed as part of the Remedial Action work at the Site will be included in the groundwater sampling program.

USEPA Comment #6

Section 6.0. Provide the correct reference for the monitoring schedule.

Response

Section 6.0 has been updated to reference Table 2. Table 2 has been updated to correctly illustrate the monitoring schedule for the gas probes.

USEPA Comment #7

Section 7.2. Include text that states that data validation memorandum will be included with validated data as attachments in the quarterly progress reports.



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Response

Since quarterly monitoring reports may not be required long-term for the project, the text in Section 7.2 has been revised to indicate that data validation memoranda will be provided with any data submittals provided to USEPA after a groundwater monitoring event.

USEPA Comment #8

Table 2 - Update this table so that the well names are consistent with Table 1. Please include the well inventory consistent with comment 5.

Response

Table 2 has been updated with the correct well identification names. Monitoring wells listed in the table are divided into upgradient and down gradient wells.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

GAC/adh/18 Encl.

C.C.: J. Saric (USEPA)

L. Kirby-Miles (USEPA)

S. Borries (USEPA)

R. Frey (USEPA)

K. Zakrzewski (MDEQ)

R. Gay (Weyerhaeuser)

M. Lebo (Weyerhaeuser)

J. Jackowski (Weyerhaeuser)

M. Erickson (Arcadis)

D. Penniman (Arcadis)

G. Griffith (Georgia-Pacific LLC)

J. Keiser (CH2M Hill)

S. Hutsell (CH2MHill)

J. Dembowske (CRA)